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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,	Case No. 2:16 CR 631 DAK
Plaintiff,	
vs.	SUPPLEMENTAL NOTIFICATION OF COMPLIANCE AND REQUEST FOR RECIPROCAL DISCOVERY
AARON MICHAEL SHAMO,	Judge Kimball
Defendant.	

The United States of America, by and through the undersigned, hereby files its supplemental notification of compliance with its discovery obligations in this case and request for reciprocal discovery from the defendant.

The United States gives notice that the following is being or has been provided to counsel for the defendant, and was made available on the discovery deadline:

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Description	Bates Number
<p>Discovery produced:</p> <p>NOC 15</p> <p>Some folders include additional native files, video and/or audio</p>	<p>001-007-031-00001 – 001-007-054-00001 001-019-002-00001 – 001-019-002-00010 001-020-001-00001 – 001-020-015-00003</p> <p>002-037-002-00001 (Video files) 002-014-026-00001 – 002-014-041-00003 002-059-001-00001 – 002-059-003-00019 002-060-001-00001 – 002-060-005-00002</p> <p>003-014-001-00001 - 003-014-001-00095</p> <p>004-005-011-00001 (Native files) 004-007-001-00007 – 004-007-094-00005 004-009-001-00001 – 004-009-006-00001 004-010-001-00001 – 004-010-001-00004 004-011-001-00001 – 004-011-001-00007</p> <p>005-004-011-00001 – 005-004-011-00003 005-005-010-00001 – 005-005-010-00002 005-008-003-00001 – 005-008-003-00002 005-011-004-00001 – 005-011-004-00005 005-012-004-00001 – 005-012-005-00001 005-013-002-00001 – 005-013-002-00602</p>

The United States continues to make available forensic data from seized electronic devices. Parties who seek to obtain their own copy of the forensic data have been asked to provide hard drives to the United States Attorney's Office.

Throughout this case, the United States will provide material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act without requiring the defendant to make a specific request for such material. Upon the request of the defendant, the United States will permit and facilitate the defendant's own inspection, copying or photographing of those items described/defined in Rule 16(a)(1)(E).

The United States also hereby requests disclosure of evidence by the defendant (also known as reciprocal discovery) pursuant to Rule 16(b) of the Federal Rules of

Criminal Procedure and DUCrimR 16-1(c). By providing Rule 16 discovery without requiring a specific request from the defense, the United States invokes a reciprocal obligation on the defendant under DUCrimR 16-1(c), which states that the defendant must allow the government to inspect and to copy the following, as further defined in Rule 16 of the Federal Rules of Criminal Procedure:

- a. Documents and tangible objects the defendant intends to introduce as evidence at trial;
- b. Reports of examinations and tests the defendant intends to introduce at trial or that were prepared by a witness whom the defendant intends to call at trial; and
- c. A written summary of the testimony of any expert the defendant intends to use a trial under Federal Rules of Evidence 702, 703 and 705.

The United States requests that the defendant provide to the government at a reasonable time before trial, but no later than five working days before trial, copies of the material referenced in this paragraph. Further, the United States requests continuing compliance with the reciprocal discovery following the initial disclosure.

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The United States also hereby requests all written and recorded statements by any witness other than the defendant whom the defendant intends to call at trial or a hearing covered by the Jencks Act or Rule 26.2 of the Federal Rules of Criminal Procedure.

DATED this 12th day of April, 2019.

JOHN W.HUBER
United States Attorney

/s/ Michael Gadd
MICHAEL GADD
Special Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of the United States Attorney's Office, and that a copy of the foregoing SUPPLEMENTAL NOTIFICATION OF COMPLIANCE was made available VIA USAFX to all parties named below, this 12th day of April, 2019.

Gregory G. Skordas
Attorney for Def. Shamo (1)

Daryl Sam
Attorney for Def. Shamo (1)

Jim Bradshaw
Attorney for Def. Crandall (2)

Edward Brass
Attorney for Def. Tonge (3)

Earl Xaiz
Attorney for Def. Bustin (4)

Kyler Ovard
Attorney for Def. Noble (5)

Eric Benson
Attorney for Def. Gygi (6)

/s/ Yvette Laughter
Litigation Support Specialist